

1 WILLIAM A. ISAACSON (*Pro hac vice*)
(wisaacson@bsflfp.com)
2 STACEY K. GRIGSBY (*Pro hac vice*)
(sgrigsby@bsflfp.com)
3 NICHOLAS A. WIDNELL (*Pro hac vice*)
(nwidnell@bsflfp.com)
4 BOIES SCHILLER FLEXNER LLP
1401 New York Avenue, NW, Washington, DC 20005
5 Telephone: (202) 237-2727; Fax: (202) 237-6131

6 RICHARD J. POCKER #3568
(rpocker@bsflfp.com)
7 BOIES SCHILLER FLEXNER LLP
300 South Fourth Street, Suite 800, Las Vegas, NV 89101
8 Telephone: (702) 382-7300; Fax: (702) 382-2755

9 DONALD J. CAMPBELL #1216
(djcc@campbellandwilliams.com)
10 J. COLBY WILLIAMS #5549
(jcw@campbellandwilliams.com)
11 CAMPBELL & WILLIAMS
700 South 7th Street, Las Vegas, NV 89101
12 Telephone: (702) 382-5222; Fax: (702) 382-0540

13 *Attorneys for Defendant Zuffa, LLC, d/b/a*
14 *Ultimate Fighting Championship and UFC*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 Cung Le, Nathan Quarry, Jon Fitch, Brandon
18 Vera, Luis Javier Vazquez, and Kyle
Kingsbury on behalf of themselves and all
19 others similarly situated,

20 Plaintiffs,

21 vs.

22 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

23 Defendant.

Case No.: 2:15-cv-01045 RFB-(PAL)

**ZUFFA, LLC'S MOTION TO SEAL ECF
NO. 524-5**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Local Rule 10-5(b), and Section 14.3 of the Revised Stipulation and Protective Order issued by this Court on February 10, 2016 (ECF No. 217), Zuffa, LLC hereby moves this Court for leave to lodge Exhibit 3 to the Declaration of Nicholas Widnell In Support of Zuffa, LLC's Motion to Exclude the Testimony of Dr. Hal Singer Under Fed. R. Evid. 702 and *Daubert* (ECF No. 524-5) under seal.

The original exhibit filed at ECF No. 524-5 is a redacted public version of an expert report, the original version of which was filed under seal. The redacted version contains an error that disclosed information that has been designated Confidential.

Along with this motion, Zuffa filed a Notice of Corrected Image/Document that attached a corrected version of Exhibit 3 to the Widnell Declaration which cures the deficiency in the original public version and allows the public access to all non-confidential portions of the exhibit. The justification for the sealing of this exhibit is set forth fully in Zuffa, LLC's Motion to Seal Zuffa's Motions to Exclude The Testimony of Dr. Hal J. Singer, Dr. Andrew Zimbalist, and Guy A. Davis Under Fed. R. Evid. 702 and *Daubert* and Related Materials (ECF No. 525).

Zuffa now asks the Court to seal the earlier version of the exhibit (ECF No. 524-5) in order to protect the confidential information.

DATED this twenty-sixth day of February, 2018

Dated: February 26, 2018

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Nicholas A. Widnell

Nicholas A. Widnell (Pro Hac Vice)
BOIES, SCHILLER & FLEXNER LLP
5301 Wisconsin Ave., NW,
Washington, DC 20015
Tel: (202)237-2727
Fax: (202)237-6131
Email: nwidnell@bsflp.com

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **Zuffa, LLC's Motion to Lodge Materials Under Seal** was served on Zuffa and opposing counsel on February 26, 2018 via email and the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Suzanne E. Nero

An employee of Boies Schiller Flexner LLP